

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

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AVENISH KUMAR, et al.,)	
)	Appeal No. 16-2267 (L)
<i>Plaintiffs-Appellants/Cross-Appellants,</i>)	Con. Nos.: 16-2269; 16-2271;
)	16-2272; 16-2273; 16-2275;
v.)	16-2276; 16-2280; 16-2281;
)	16-2282; 16-2283; 16-2284;
REPUBLIC OF SUDAN,)	16-2285; 16-2286; 16-2287;
)	16-2288; 16-2289; 16-2290;
<i>Defendant-Appellant/Cross-Appellee.</i>)	16-2365.
_____)	

PLAINTIFFS-APPELLEES/CROSS-APPELLANTS’
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
OPENING/RESPONSE BRIEF

Plaintiffs-Appellees/Cross-Appellants, Avenish Kumar, et al., hereby submit this unopposed motion for extension of time to file their opening/response brief, and state as follows:

1. Defendant-Appellant/Cross-Appellee Republic of Sudan’s (“Sudan”) opening brief was initially due to be filed on January 10, 2017. *See* Dkt. No. 16.
2. After requesting an extension of the briefing deadline (Dkt. No. 18), which was granted (Dkt. No. 19), Sudan filed its opening brief on January 31, 2017 (Dkt. No. 21).
3. On February 7, 2017, the United States filed an amicus curiae brief in support of certain arguments made by Sudan. *See* Dkt. Nos. 25 and 27.

4. The deadline for filing Plaintiffs-Appellees/Cross-Appellants' opening/response brief is currently March 2, 2017. *See* Dkt. No. 19.

5. Due to the complex issues raised in Sudan's opening brief (totaling 73 pages with citations to more than 120 authorities) and the United States' amicus brief (totaling 28 pages with citation to more than 50 authorities) requiring extensive research, as well as the drafting of the Plaintiffs-Appellees/Cross-Appellants' own opening brief, and the undersigned's busy schedule, Plaintiffs-Appellees/Cross-Appellants require additional time in which to prepare their opening/response brief.

6. Accordingly, pursuant to Rule 26(b), Federal Rules of Appellate Procedure, Plaintiffs-Appellees/Cross-Appellants respectfully request the Court grant them an extension of time of thirty (30) days up through and including April 3, 2017, to file their opening/response brief, and a concomitant adjustment of the remaining briefing deadlines as follows:

Appellees/Cross-Appellants' opening/response brief: April 3, 2017

Appellant/Cross-Appellee's response/reply brief: May 3, 2017

Reply brief permitted within 14 days of service of response/reply brief

7. Plaintiffs-Appellees/Cross-Appellants have requested no prior extensions of time.

8. Counsel for Plaintiffs-Appellees/Cross-Appellants has contacted counsel for Sudan in regard to the aforementioned request for extension of time.

Counsel for Sudan has represented that it has no objection to the Plaintiffs-Appellees/Cross-Appellants' request, but requests an equivalent extension of the deadline for filing its response/reply brief.

WHEREFORE, Plaintiffs-Appellees/Cross-Appellants, Avenish Kumar, et al. respectfully request that the Court grant the extension of the briefing deadlines requested herein.

DATED: February 23, 2017

HALL, LAMB, HALL & LETO, P.A.

/s/ Andrew C. Hall

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